

ORIGINAL

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November 14, 2002

~~WRITTEN EX PARTE~~

Ms Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WC Docket No. 02-307 Ex Parte # 3

The staff of the Wireline Competition Division working on the pending BellSouth application for authorization to provide interLATA services in Florida and Tennessee has asked BellSouth to discuss in writing its performance in Florida for the five month period from May through September 2002 under the Missed Repair Appointments submetric for non-designed 2-wire analog loops. Attached is BellSouth's response to that request.

In accordance with Section 1.1206, I am filing this notice and a copy with the attached responses and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Christine Newcomb  
Janice Myles  
Luin Fitch  
Beth Keating

Rodney McDonald  
James Davis-Smith  
Sara Kyle

Varner Direct Affidavit, Exhibit PM-2

% Provisioning Troubles w/i 30 Days (B.2.19)

143. BellSouth in Florida met or exceeded the retail analogues for 13 of the 15 sub-metrics in May through July 2002. For the two missed sub-metrics, there were only eight total trouble reports combined for the two months. These small universe sizes do not provide valid comparisons to the retail analogue.

**(Added for August and September)**

For the 2W Analog Loop Non-Design Dispatched-In sub-metric (B.2.19.9.1.4), BellSouth met the retail analogue in August but did not in September. The dispatched-in sub-metric represents those circuits that were engineered to go into service without requiring a technician be dispatched to the field location. Work had to be done only within the central office, such as providing a cross-connection from the cable pair to the CLEC collocation point. During the period of May through September there were a total of 13 troubles reported for all the orders that completed during the period. In September there were a total of 2 troubles reported; with only 9 orders completing that month, however, the small universe did not allow for any troubles to be reported if BellSouth was to meet the retail analog comparison. For the 5-month period BellSouth could only have a total of 4 troubles and still meet the retail analogue comparison of 4%. Such a small CLEC universe of 122 over 5 months does not produce a statistically valid comparison with a retail analogue volume of over 1.6 million orders,

% Missed Repair Appointments / 2w Analog Loop Non-Design (B.3.1.9)

147. BellSouth in Florida met the retail analogue requirement for 3 of the 6 sub-metrics that had CLEC activity in May through July 2002. For the May "Dispatched" measurement, 60 of the 104 total missed appointments were due to wet or damaged feeder cable. Sixteen of the remaining appointments were missed by less than one hour. For the May "Non-Dispatched" measurement, two of the six missed appointments were missed by less than thirty minutes each. The other four missed appointments were due to improper order close-out procedures associated with a multi-trouble order for the same customer. No BellSouth trouble was found during joint testing with another vendor, and the reports were sent to the cable group for an additional check. In this case, the original reports should have been closed out within the allotted period and a new report created. Maintenance techs have been covered on appropriate order close-out procedures. There were eighteen total missed appointments for the Non-Dispatched measurement in July. Two of the eighteen were closed as TOK/FOK, and fifteen of the remaining sixteen were the result of two multiple troubles – one involving five circuits and the other involving ten circuits.

**(Added for August and September Results)**

For the Repair Appointments that required a dispatch (B.3.1.9.1), BellSouth met the retail analogue comparison in August but did not in September. In September, BellSouth missed 113 of the 876 scheduled repair appointments.

Repair Appointments are measured based on the time the trouble is cleared by the technician. When a customer reports a trouble, the customer is given a time that the trouble will be resolved, not a time at which the technician will arrive at the customer's location. Many of BellSouth's repair appointments are missed because the technician was unable to complete the repair by the time that was given when the appointment was established, even though the technician has been on site working on the problem. In September, a total of 17 of the 113 missed appointments were cleared within 30 minutes of the time given to the customer when the appointment was established. These 17 missed appointments were the difference between BellSouth's performance under this sub-metric meeting the retail analogue comparison in September.

For the Repair Appointments that did not require a dispatch to resolve the trouble (B.3.1.9.2), BellSouth met the retail analogue comparison in August but did not meet the comparison in September. In September, for 2-wire analog non-design UNE loops, there were only a total of 41 repair appointments scheduled, with BellSouth not having the trouble repaired as promised for 3 of them. With such a small universe, BellSouth could not have any missed appointments if it was still to meet the retail analogue comparison.